



8 UNITED STATES DISTRICT COURT

9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 November 2021 Grand Jury

11 UNITED STATES OF AMERICA,

CR 2:22-cr-00123-ODW

12 Plaintiff,

I N D I C T M E N T

13 v.

[18 U.S.C. § 1344(2): Bank Fraud;  
18 U.S.C. § 1029(a)(3): Possession  
of Fifteen or More Unauthorized  
Access Devices; 18 U.S.C.  
§ 1028A(a)(1): Aggravated Identity  
Theft; 18 U.S.C. § 1704: Unlawful  
Possession of a Counterfeit Postal  
Key; 18 U.S.C. § 1708: Possession  
of Stolen Mail; 18 U.S.C. §§ 981,  
982, and 1029, and 28 U.S.C.  
§ 2461(c): Criminal Forfeiture]

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20 The Grand Jury charges:  
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1 COUNT ONE

2 [18 U.S.C. § 1344(2) ]

3 A. INTRODUCTORY ALLEGATIONS

4 At times relevant to this Indictment:

5 1. Citibank, N.A. ("Citibank") was a financial institution  
6 insured by the Federal Deposit Insurance Corporation.

7 2. Victim D.G. had a Citibank credit card in her name (the  
8 "D.G. Citibank credit card").

9 B. THE SCHEME TO DEFRAUD

10 3. Beginning on a date unknown to the Grand Jury, but no later  
11 than on or about December 7, 2020, and continuing through at least on  
12 or about December 18, 2020, in Los Angeles County, within the Central  
13 District of California, and elsewhere, defendant MARK JAMES URIAS,  
14 knowingly and with intent to defraud, devised and executed a scheme  
15 to obtain moneys, funds, assets, and other property owned by and in  
16 the custody and control of Citibank by means of material false and  
17 fraudulent pretenses, representations, and promises, and the  
18 concealment of material facts.

19 4. The fraudulent scheme operated, and was carried out, in  
20 substance, in the following manner:

21 a. Defendant URIAS would steal mail, including using  
22 counterfeit postal arrow keys, to obtain credit cards and other  
23 personal identifying information ("PII"), including the D.G. Citibank  
24 credit card.

25 b. Defendant URIAS would use the stolen credit cards and  
26 PII, including the D.G. Citibank credit card, to make fraudulent  
27 purchases without permission or authorization from the card account  
28 holders. In doing so, defendant URIAS falsely represented that he

1 was the account holder and was otherwise an authorized user of the  
2 credit card account, and concealed that the purchases defendant URIAS  
3 made with the credit cards were made without any authorized user's  
4 consent.

5 C. EXECUTION OF THE FRAUDULENT SCHEME

6 5. On or about December 7, 2020, in Los Angeles County, within  
7 the Central District of California, defendant URIAS used the D.G.  
8 Citibank credit card to make a purchase for \$318.26 from a Home Depot  
9 in Palmdale, California, which constituted an execution of the  
10 fraudulent scheme.

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1 COUNT TWO

2 [18 U.S.C. § 1028A(a)(1)]

3 On or about December 7, 2020, in Los Angeles County, within the  
4 Central District of California, defendant MARK JAMES URIAS knowingly  
5 transferred, possessed, and used, without lawful authority, means of  
6 identification that defendant URIAS knew belonged to another person,  
7 namely, the name of victim D.G. and a credit account number belonging  
8 to victim D.G., during and in relation to the offense of Bank Fraud,  
9 a felony violation of Title 18, United States Code, Section 1344(2),  
10 as charged in Count One of this Indictment.

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1 COUNT THREE

2 [18 U.S.C. § 1029(a)(3)]

3 On or about December 18, 2020, in Los Angeles County, within the  
4 Central District of California, defendant MARK JAMES URIAS, knowingly  
5 and with intent to defraud, possessed at least fifteen unauthorized  
6 access devices (as defined in Title 18, United States Code, Sections  
7 1029(e)(1) and (3)), namely, approximately 39 debit, credit, and bank  
8 account numbers and 8 social security numbers, all belonging to  
9 persons other than defendant URIAS, with said possession affecting  
10 interstate and foreign commerce.

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1 COUNT FOUR

2 [18 U.S.C. § 1028A(a)(1)]

3 On or about December 18, 2020, in Los Angeles County, within the  
4 Central District of California, defendant MARK JAMES URIAS knowingly  
5 possessed, without lawful authority, means of identification that  
6 defendant URIAS knew belonged to another person, namely, the name and  
7 address of victim K.M., during and in relation to the offense of  
8 Possession of Fifteen or More Unauthorized Access Devices, a felony  
9 violation of Title 18, United States Code, Section 1029(a)(3), as  
10 charged in Count Three of this Indictment.

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1 COUNT FIVE

2 [18 U.S.C. § 1704]

3 On or about December 18, 2020, in Los Angeles County, within the  
4 Central District of California, defendant MARK JAMES URIAS knowingly  
5 possessed with the intent to unlawfully and improperly use, and to  
6 cause the same to be unlawfully and improperly used, a key suited to  
7 locks adopted and in use at the time by the United States Post Office  
8 Department and Postal Service, and to any authorized receptacle for  
9 the deposit or delivery of mail matter, namely, a counterfeit Postal  
10 Service "arrow" key.

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1 COUNT SIX

2 [18 U.S.C. § 1708]

3 On or about December 18, 2020, in Los Angeles County, within the  
4 Central District of California, defendant MARK JAMES URIAS unlawfully  
5 possessed mail and mail matter that had been stolen and taken from  
6 the United States mail, namely, approximately 141 pieces of mail and  
7 mail matter addressed to various individuals within Los Angeles  
8 County and elsewhere, and at that time and place, defendant URIAS  
9 knew said mail and mail matter were stolen.

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1 FORFEITURE ALLEGATION ONE

2 [18 U.S.C. § 982]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 982(a)(2), in the event of the  
7 defendant's conviction of the offense set forth in either of Counts  
8 One or Two of this Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United  
10 States of America the following:

11 (a) All right, title and interest in any and all property,  
12 real or personal, constituting, or derived from, any proceeds  
13 obtained, directly or indirectly, as a result of the offense; and

14 (b) To the extent such property is not available for  
15 forfeiture, a sum of money equal to the total value of the property  
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),  
18 as incorporated by Title 18, United States Code, Section 982(b), the  
19 defendant, if so convicted shall forfeit substitute property, up to  
20 the total value of the property described in the preceding paragraph  
21 if, as the result of any act or omission of the defendant, the  
22 property described in the preceding paragraph, or any portion  
23 thereof: (a) cannot be located upon the exercise of due diligence;  
24 (b) has been transferred, sold to or deposited with a third party;  
25 (c) has been placed beyond the jurisdiction of the court; (d) has  
26 been substantially diminished in value; or (e) has been commingled  
27 with other property that cannot be divided without difficulty.

1 FORFEITURE ALLEGATION TWO

2 [18 U.S.C. §§ 982 and 1029]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States will seek  
5 forfeiture as part of any sentence, pursuant to Title 18, United  
6 States Code, Sections 982(a)(2) and 1029, in the event of the  
7 defendant's conviction of the offenses set forth in either of Counts  
8 Three or Four of this Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United  
10 States of America the following:

11 (a) All right, title, and interest in any and all  
12 property, real or personal, constituting, or derived from, any  
13 proceeds obtained, directly or indirectly, as a result of any such  
14 offense;

15 (b) Any personal property used or intended to be used to  
16 commit the offense; and

17 (c) To the extent such property is not available for  
18 forfeiture, a sum of money equal to the total value of the property  
19 described in subparagraphs (a) and (b).

20 3. Pursuant to Title 21, United States Code, Section 853(p),  
21 as incorporated by Title 18, United States Code, Sections 982(b)(1)  
22 and 1029(c)(2), the defendant, if so convicted, shall forfeit  
23 substitute property, up to the total value of the property described  
24 in the preceding paragraph if, as the result of any act or omission  
25 of the defendant, the property described in the preceding paragraph,  
26 or any portion thereof: (a) cannot be located upon the exercise of  
27 due diligence; (b) has been transferred, sold to or deposited with a  
28 third party; (c) has been placed beyond the jurisdiction of the

1 court; (d) has been substantially diminished in value; or (e) has  
2 been commingled with other property that cannot be divided without  
3 difficulty.

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1 FORFEITURE ALLEGATION THREE

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 981(a)(1)(C) and Title 28, United States  
7 Code, Section 2461(c), in the event of the defendant's conviction of  
8 the offense set forth in Count Six of this Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United  
10 States of America the following:

11 (a) All right, title, and interest in any and all  
12 property, real or personal, constituting, or derived from, any  
13 proceeds traceable to the offense; and

14 (b) To the extent such property is not available for  
15 forfeiture, a sum of money equal to the total value of the property  
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),  
18 as incorporated by Title 28, United States Code, Section 2461(c), the  
19 defendant, if so convicted, shall forfeit substitute property, up to  
20 the value of the property described in the preceding paragraph if, as  
21 the result of any act or omission of the defendant, the property  
22 described in the preceding paragraph or any portion thereof (a)  
23 cannot be located upon the exercise of due diligence; (b) has been  
24 transferred, sold to, or deposited with a third party; (c) has been  
25 placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with  
2 other property that cannot be divided without difficulty.

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4 A TRUE BILL  
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7 /S/  
8 Foreperson  
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10 TRACY L. WILKISON  
11 United States Attorney  
12



13 SCOTT M. GARRINGER  
14 Assistant United States Attorney  
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